

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

THOMAS W. AVENT, JR.)
)
Plaintiff,)
) Case No.: 16-CV-01127-TWT
v.)
)
RAYMOND PIRRELLO)
)
Defendant.)

**CONSENT MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

Defendant Raymond Pirrello hereby submits this consent motion moving this Honorable Court for an extension of time within which Defendant must answer, move, or otherwise respond to Plaintiff Thomas W. Avent, Jr.'s Complaint. Plaintiff has agreed to this extension.

In support, Defendant shows as follows:

1. Plaintiff Thomas W. Avent, Jr. initiated this lawsuit and filed the Complaint on April 7, 2016. Defendant Raymond Pirrello was named in the Complaint and properly served.
2. The parties have agreed that, to accommodate the schedules of defense counsel, Defendant Raymond Pirrello shall have until May 23, 2016, to answer, move, or otherwise respond to the Complaint.

3. The relief requested herein is for good cause and it is respectfully submitted will not result in undue delay in the administration of this case. An extension of time for filing Defendant's response is necessary since Defendant's Counsel has filed a motion for admission *pro hac vice* through local counsel and is awaiting admission, and to accommodate his workload and vacation schedule.

4. Defendant Raymond Pirrello respectfully requests that a short extension of time be granted through and including May 23, 2016, by which Defendant must answer, move, or otherwise respond to the Complaint. All parties have agreed to the foregoing.

5. Defendant Raymond Pirrello is submitting a proposed Order with this Motion.

Respectfully submitted, this 10th day of May 2016.

By: /s/ Raymond L. Moss
Raymond L. Moss, Esq.
Georgia Bar No. 526569
MOSS & GILMORE, LLP
3630 Peachtree Road
Suite 1025
Atlanta, Georgia 30326
Tel: (678) 381-8601
Fax: (815) 364-0515
Email: rilmoss@mossgilmorelaw.com

Attorneys for Defendant

CONSENTED TO:

Robert C. Khayat, Jr.
The Khayat Law Firm
75 Fourteenth Street, NE, Ste. 2750
Atlanta, GA 30309
Tel: (404) 978-2750
Fax: (404) 572-5137
Email: rkhayat@khayatlawfirm.com

LR 5.1(C) CERTIFICATE OF FONT COMPLIANCE

I hereby certify that the foregoing has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C), Northern District of Georgia, specifically Times New Roman 14 point.

By: /s/ Raymond L. Moss
Raymond L. Moss, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the within and foregoing **CONSENT MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT** with the Clerk of Court using the CM/ECF system which will automatically send notification of such filing to the following attorneys of record:

Robert C. Khayat, Jr.
The Khayat Law Firm
75 Fourteenth Street, NE, Ste. 2750
Atlanta, GA 30309
Tel: (404) 978-2750
Fax: (404) 572-5137
Email: rkhayat@khayatlawfirm.com

By: /s/ Raymond L. Moss
Raymond L. Moss, Esq.